

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: JAMES SIMMONS and :
KEISHA SIMMONS :
Debtors : No: 19-01991-RNO
: Chapter 13
:

OBJECTION TO DEBTORS' MOTION TO INCUR POST-PETITION DEBT

Now comes creditor, CCP Property Owners Association South (the "Association"), and objects to Debtors' *Motion to Incur Additional Debt*, and in support thereof avers:

1. The proposed loan provides for only \$127/month for future common area assessments, yet the current monthly charges are \$186.13/month, creating a monthly delinquency of \$59.13 (\$709.56 annually). There is no explanation in the Motion as to how this shortfall will be remedied.
2. CCP has not received any pre-petition plan payments through the Trustee.
3. Debtors are currently delinquent on post-petition assessments to the sum of \$4,983.90.
4. Based on the above factors, the proposed loan provides no protection to CCP to ensure resolution of the post-petition delinquency and full payment of post-motion monthly assessments.

WHEREFORE, Association respectfully requests that the present Motion be denied unless the above protections can be provided for.

YOUNG & HAROS, LLC

Date: 3/18/21



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